

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: : **CHAPTER 13**
WILLIAM BENNETT GOURLEY : **CASE NO. 1:17-bk-01736**
aka William Gourley :
KATHLEEN DENISE GOURLEY, :
Debtors :
:

MOTION TO SUSPEND PAYMENTS

COME NOW the Debtors, by and through attorney Dorothy L. Mott, Esquire, and request the modification of the payment schedule under the Chapter 13 Plan, respectfully stating in support thereof as follows:

1. The Debtors filed a Chapter 13 Bankruptcy Petition on April 27, 2017.
2. The Plan provides for monthly payments to the Trustee.
3. The Debtors' income will be reduced for several months, because the Debtor was unemployed.
4. The Debtors request that the payments required to be made under the Plan be reduced to \$0.00 for three (3) months.
5. The Chapter 13 Trustee, Charles J. DeHart, III, concurs in this motion.

WHEREFORE, the Debtors respectfully request that this Court enter an order reducing the payments under the Plan to \$0.00 for a period of three (3) months and permitting the remainder to be made in a lump sum at the end of the Chapter 13 Plan.

Respectfully submitted,

/s/ Dorothy L. Mott

Dorothy L. Mott, Esquire
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Debtors :
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O R D E R

UPON CONSIDERATION of the Motion to Suspend Trustee Payments;

It is hereby ORDERED AND DECREED that the Debtors' payments are reduced to \$0 for a period of three months and that the Debtors are hereby permitted to pay the remainder of the payments for said period in a lump sum at the end of the Chapter 13 Plan.

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

William Bennett Gourley
aka William Gourley
Kathleen Denise Gourley

Chapter:13

Case number:1:17-bk-01736

Debtors

Matter: Motion to Suspend Payments

William Bennett Gourley
aka William Gourley
Kathleen Denise Gourley

Movants

vs,

Notice

NOTICE OF OPPORTUNITY TO OBJECT AND HEARING: Pursuant to Local Rule 2002-1(a), the Court will consider this motion, objection or other matter without further notice or hearing unless a party in interest files an objection/response within twenty-one (21) days of the date of the notice. If you object to the relief requested, you must file your objection/response with the Clerk, U. S. Bankruptcy Court, 228 Walnut Street, Third Floor, PO Box 908, Harrisburg PA 17108-0908 and serve a copy on the movant and movant's attorney, if one is designated.

If you file and serve an objection/response within the time permitted, the Court may schedule a hearing and you will be notified. If you do not file an objection within the time permitted the Court will deem the motion unopposed and proceed to consider the motion without further notice or hearing, and may grant the relief requested.

Date: June 28, 2019

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KATHLEEN DENISE GOURLEY, :
Debtor

CERTIFICATE OF SERVICE

I certify that I am more than 18 years of age and that on June 28, 2019 I served a copy of the Motion to Suspend Payments on the following parties:

Name and Address	Mode of Service
CHARLES J DEHART III ESQUIRE 8125 ADAMS DRIVE, SUITE A HUMMELSTOWN PA 17036	Electronically

I certify under penalty of perjury that the foregoing is true and correct.

/s/ Dorothy L. Mott, Esquire
Dorothy L. Mott
Dorothy L. Mott Law Office, LLC
125 State Street
Harrisburg PA 17101